

**REMARKS/ARGUMENTS**

In view of the amendments and remarks herein, favorable reconsideration and allowance of this application are respectfully requested. Claims 1-21 are pending.

With respect to the drawing objections, Applicant has submitted new drawing sheets herewith. With respect to the Section 112 rejections, the claims have been amended in a manner that is believed to obviate this rejection.

Claims 1-3, 5-9, 13-16 and 18-20 have been rejected as being obvious over Ballhorn in view of Richardson. Claims 4, 11 and 21 have been rejected as being obvious over Ballhorn in view of Richardson, and further in view of Rhoads. Claims 10, 17 and 19 have been rejected as being obvious over Ballhorn in view of Richardson, and further in view of Kleiman. Claim 12 has been rejected as being obvious over Ballhorn in view of Richardson, and further in view of Dobbs et al. For at least the reasons set forth below, Applicant respectfully submits that the cited references do not support the rejection of the claims, as amended herein.

Ballhorn describes "A multimedia box network comprising:

- a main data server including a mass storage device on which digital pieces of music and/or videos are stored;
- an operator group including at least one multimedia box linked to said main data server by a first data link over which pieces of music and/or videos are transmitted, said at least one multimedia box including an operating unit, a local storage device and a player apparatus;

- a peripheral management station connected to said main data server by a second data link over which said peripheral management station can receive data on the pieces of music and/or videos available on said main data server, said peripheral management station including a computer connected to said operator group by a third data link over which data for servicing and/or programming of said at least one multimedia box can be transferred from said peripheral management station.”

The peripheral management station described in Ballhorn has nothing to do with a network site manager communicating with a database of a server and managing a network site installed on the server. Ballhorn describes (column 5, lines 1-19) a management station storing a user database allowing the user to modify the presentation types and billing procedures of the jukeboxes it manages and a service database allowing the user to modify the media files stored on the jukeboxes it manages. The present invention describes an network site and a network site manager for managing the information accessible by a user connected to a server enabling the access of this user to the audiovisual reproduction devices it manages.

In the present claims, a management station such as a computer, for instance, does not need to store anything and does not need any particular implementation but a connection to network, a browser and authentication information of the user, in contrast to the invention taught by Ballhorn. The network site manager of the present claims will provide a standard computer with the necessary means and information for performing the management of the audiovisual reproduction devices connected to the server and

which the user is allowed to manage based on its rights defined by his authentication information.

Furthermore, the user database and the service database stored on the peripheral management station of Ballhorn do not store as many detailed information as the database of the server of the present invention and thus do not allow the control of the operating parameters of the audiovisual reproduction devices, as in the present claims. Ballhorn only describes a control of the “graphics and presentation forms” and “billing procedures” (column 3, lines 1-5 and column 5, lines 6-9). Indeed, the network site manager of the present invention allows the control of several settings of the audiovisual reproduction device. For example, in the present invention, the user can be allowed to update the music stored on each audiovisual reproduction device and to change their operating parameters such as the settings of the sound volume, the settings of an equalizer, the settings of the amount of money needed for playing audiovisual information, the settings of the use of a microphone, and so on.

In Ballhorn, there is neither any suggestion of a network site manager, nor even of any network site at all, nor of settings other than those concerning the visual representation and the billing procedure. The present claims, citing a “network site and network site manager communicating with a database of a server and managing the network site installed on the server, for enabling a user connected to the network site to modify, in a plurality of screens, some information relating to at least music stored on

audiovisual reproduction devices or operating parameters of the audiovisual reproduction devices, is thus new and inventive over Ballhorn.

Richardson describes “a method for allowing a user to create group views of a managed network environment information by dynamically manipulating a user interface of a windows-based computer environment, comprising:

displaying a list of a plurality of group views within the user interface, each group view of the plurality of group views representative of a grouping of network components and containing a plurality of group view attributes, defined by a plurality of attribute values in a group view attribute list stored in a database, that define the grouping of network components of the group view, wherein a user can dynamically change one or more group views of the plurality of group views by changing one or more group view attributes of the plurality of group view attributes stored in the database; selecting to add a new group view to the plurality of group views;

the user entering a plurality of group view attributes of the new group view into a new group view attribute list via the user interface and assigning an attribute value to each group view attribute of the plurality of group view attributes of the new group view in the new group view attribute list and storing the plurality of group view attributes and associated attribute values in the new group view attribute list in the database;

adding the new group view to the plurality of group views; and

displaying an updated list of a plurality of group views that includes the new group view.”

Richardson describes a custom "Network Node Manager" (NNM) which enables a user to specify the graphical interface and the group views to be displayed on his "Network Node Manager" console (NNM console). Richardson defines a "Network Node Manager" as a product receiving events and allowing a user to manage network devices. This custom NNM of Richardson is thus executed on a remote management station which can access a server controlling a network of devices. Thus, as in Ballhorn, the remote management station of Richardson needs some particular modification (installation of the NNM console) to access the functions of the networked devices. There is no suggestion in Richardson to install a network site manager on a server to provide the server with a network site enabling users to access to some audiovisual reproduction devices controlled by the server. Thus, Richardson does not disclose a network site manager, nor any network site at all.

Furthermore, the invention of Richardson does not allow the user to modify the operating parameters of the networked devices under the control of a server. It only allows modifying the various devices to be displayed and the graphical presentation of these devices on the NNM console. Richardson also teaches (in the preamble) that NNM consoles can display the configuration of the network and allows optimizing the configuration of this network, but there is no suggestion of any modification of the devices themselves.

The present claims, reciting a network site and a network site manager communicating with a database of a server and managing the network site installed on the

server, for enabling a user connected to the network site to modify, in a plurality of screens, some information relating to at least music stored on audiovisual reproduction devices or operating parameters of the audiovisual reproduction devices, is thus new and inventive over Richardson.

Moreover, the combination of Ballhorn's and Richardson's teachings would have lead one of ordinary skill in the art to propose a remote management station storing a user database and a service database for managing jukeboxes and storing information for the execution of a NNM console on the remote station for selecting the jukeboxes to control and for controlling the display of the jukeboxes controlled and probably to modify some graphical display or billing procedures used on the jukeboxes. Such a combination has nothing to do with the present claims in which a network site manager communicates with a database of a server storing operating parameters, music and diverse information related to audiovisual reproduction devices connected to the server and managing a network site allowing users to remotely manage the information stored on the server and related the audiovisual reproduction devices.

For at least the forgoing reasons, Applicant believes that the combined teachings of Richardson and Ballhorn do not establish a prima facie case of obviousness under Section 103. Thus, reconsideration and withdrawal of this rejection are respectfully requested.

With respect to the rejection of claims 4, 11 and 21, Rhoads describes a method of authentication of a user but not for accessing a network site of a server enabling users to

control, using a network site manager installed on the server, at least the music and/or the operating parameters stored in audiovisual reproduction devices connected to the server, as disclosed in claim 4.

Rhoads also describes a method for enabling a media to be played a determined number of times depending on an authentication process but this has nothing to do with claim 11 in which the number of media files or the number of times a given media file can be played after a payment a fees.

Rhoads also describes that digitally encoded data can be played after an authorization process allowing the decompression of the data, as argued by the examiner, but this has nothing to do with claim 21 of the present invention in which the data is also encrypted for securing the transfer of the media file through the network and during its storage on the audiovisual reproduction device, and then decrypted when the media file is read.

Thus, Applicant believes that the combined teachings of Richardson, Ballhorn and Rhoads does not render obvious the inventions defined by claims 4, 11 and 21. Accordingly, reconsideration and withdrawal of this rejection is also respectfully requested.

With respect to the rejection involving Kleiman, Kleiman describes a management of statistics of songs played on a jukebox or on several jukeboxes, and possibly relating the statistics to the time and date at which the songs were played. However, Kleiman does not disclose any matter which would provide the combination of Ballhorn and


Richardson with a network site manager managing a network site installed on a server, for enabling users connected to the network site to control audiovisual reproduction devices connected to the server. Thus, Applicant also believes that this rejection is also not supported by the cited references. Thus, withdrawal thereof is requested.

With respect to the rejection involving Dobbs, Dobbs describes a management of a sound volume or of equalization settings. However, Dobbs does not disclose any matter which would provide the combination of Ballhorn and Richardson with a network site manager managing an network site installed on a server, for enabling users connected to the network site to control audiovisual reproduction devices connected to the server. Thus reconsideration and withdrawal of this rejection are also respectfully requested.

In view of the foregoing amendments and remarks, Applicant believes that the amended claims herein are allowable over the prior art of record. Thus, allowance of this case is earnestly solicited.

Respectfully submitted,

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**AMENDMENTS TO THE DRAWINGS**

The attached sheets of drawings includes changes to Figs. 1-3. These sheets, which include Figs. 1-3, replaces the original sheets including Figs. 1-3.

Attachment: Replacement Sheet(s)